

EXHIBIT

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From: [Freeman, Daniel \(CRT\)](#)
To: [Colmenero, Angela](#); erosenberg@lawyerscommittee.org; alltexasvoterid@dechert.com; [VOTTexasID \(CRT\)](#)
Cc: [Frederick, Matthew](#)
Subject: RE: Updated Draft of Qualifying Voters Handbook
Date: Monday, August 29, 2016 11:41:08 AM

Angela,

Thank you for the opportunity to comment on the updated draft of the Qualifying Voters Handbook. While we understand the private plaintiffs have made several potential suggestions, the United States also wishes to point out several critical areas where we believe the Handbook diverges from the letter or spirit of the Court's Interim Remedy Order (ECF No. 895).

Our first concern is that the Handbook replaces negotiated language that allows voters who do not "possess" SB 14 ID and face a reasonable impediment to obtaining it to complete a reasonable impediment declaration, Interim Remedy Order ¶ 11 & Ex. A (Declaration Instructions), with narrower language concerning whether a voter has "obtained" SB 14 ID. The following changes would correct this discrepancy:

- On Page 13, replace <has not been able to obtain an acceptable form of photo ID> with <does not possess an acceptable form of photo ID>, replace <have obtained an acceptable form of photo ID> with <possess an acceptable form of photo ID>, and replace <have not obtained an acceptable form of photo ID> with <do not possess an acceptable form of photo ID>.
- On Page 14, replace <If the voter states that they have not obtained an acceptable form of photo ID> with <If the voter states that they do not possess an acceptable form of photo ID>, replace <Not being able to obtain an acceptable form of photo ID includes that the voter has not been able to obtain a valid form of acceptable photo identification.> with <Not possessing an acceptable form of photo ID includes that the voter does not possess a valid form of acceptable photo identification.>, and replace <If the voter states that they have not obtained an acceptable form of photo ID, and the voter does not have a reasonable impediment or difficulty to obtaining an acceptable form of photo ID> with <If the voter states that they do not possess an acceptable form of photo ID, and the voter does not have a reasonable impediment or difficulty to obtaining an acceptable form of photo ID.>
- On Page 18, replace <The voter states that they have not obtained an acceptable form of photo identification> with <The voter states that they do not possess an acceptable form of photo identification>.

In addition, we are concerned that the Handbook appears to place the onus on the voter to ask for a reasonable impediment declaration, rather than directing the poll worker to inform voters who lack SB 14 ID that they may complete the declaration if they possess a reasonable impediment to obtaining SB 14 ID. This front-line interaction is a critical avenue of voter education. Therefore, we would request the following change:

- On Page 18, replace <but voter states that they do have a reasonable impediment or

difficulty in obtaining an acceptable form of photo ID> with <and the voter is asked if they have a reasonable impediment or difficulty in obtaining an acceptable form of photo ID and states that they do face such an impediment>.

Thank you for your consideration,

Dan

From: Colmenero, Angela [mailto:angela.colmenero@texasattorneygeneral.gov]
Sent: Saturday, August 27, 2016 10:41 AM
To: erosenberg@lawyerscommittee.org; alltexasvoterid@dechert.com; VOTTexasID (CRT)
Cc: Frederick, Matthew
Subject: Updated Draft of Qualifying Voters Handbook

We have attached the updated draft of the Qualifying Voters Handbook. If you have any comments, we ask that you send them to us by Monday, August 29 at 12:00 p.m. CST.

Thanks,
Angela

Sent from my iPhone